

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Adrian P. Conway	:	Chapter 7
Sharon E. Conway	:	
	:	Case No.: 19-15968-ELF
Debtor(s)	:	

**MOTION TO REOPEN CASE FOR THE LIMITED PURPOSES
OF AVOIDING LIENS**

Debtors, Adrian and Sharon Conway, by and through the undersigned counsel, hereby move this honorable court to reopen the instant Chapter 7 Bankruptcy for the limited purpose of filing Motions to Avoid Judgment Liens and hereby aver as follows:

1. The above captioned bankruptcy matter was filed as a Chapter 7 matter on September 24, 2019.
2. On January 2, 2020, an Order was entered discharging the Chapter 7 case.
3. At the time of filing the instant Chapter 7 Bankruptcy, Debtors' real estate located and known as 276 Childs Avenue, Drexel Hill, PA 19026 was encumbered by a mortgage serviced by Mr. Cooper in the sum of \$139,223.00.
4. At the time of the instant Chapter 7 filing, the debtors' property was valued at \$146,400.00.
5. The Debtors have elected to take Federal Exemptions.
6. Accordingly, any judicial lien against Debtors' real property impairs the debtors' exemptions and is otherwise unsecured based on the value of the debtors' real and/or personal property at the time of filing the instant Chapter 7 Bankruptcy matter.
7. Use of federal exemption 11 U.S.C. Section 522(D)(1) on the debtors' residence has rendered any and all equity fully exempt.

8. Subsequent to the filing of this Motion, Debtors will file Motions to Avoid the judgment liens attached to the Debtors' real property.

9. Upon these outstanding liens being brought to the attention of the undersigned counsel, this instant Motion was promptly filed.

WHEREFORE, Debtors, by and through the undersigned counsel, respectfully request this honorable court to enter an Order reopening the instant Chapter 7 Bankruptcy matter for the limited purpose of obtaining Orders Avoiding the outstanding Judicial Liens and such additional or alternative relief as may be just and proper.

Dated: March 1, 2022

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
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